

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: **BECKHAM JEWELRY, LLC**
 Debtor

CHAPTER 11
CASE NO. 25-01234-JAW

CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via email transmission and/or U.S. Mail, postage prepaid, a true and correct copy of the *Motion to Require Escrowed Subchapter V Trustee Payments* and the *Notice* in connection with same (copies of which are attached hereto as collective Exhibit "A"), to all creditors and parties-in-interest as listed on the matrix on file with the Clerk of the Court (a copy of which is attached hereto as Exhibit "B").

THIS, the 16th day of May, 2025.



Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
601 Renaissance Way
Suite A
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

N:\Firm Data\Users\Bankrupt\Subchapter V Cases\Beckham Jewelry, LLC\Pleadings\COS - Mot to Require Escrowed SubV Trustee Payments 6-3-24.wpd

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: **BECKHAM JEWELRY, LLC**
Debtor

CHAPTER 11
CASE NO. 25-01234-JAW

NOTICE

NOTICE IS HEREBY GIVEN that Craig M. Geno, the Subchapter V Trustee herein has filed his *Motion to Require Escrowed Subchapter V Trustee Payments* (the "Motion"), a copy of which is attached hereto as Exhibit "A."

PLEASE TAKE FURTHER NOTICE that all creditors and parties-in-interest wishing to object to the Motion must file a written objection or other responsive pleading within **twenty-one (21) days** from and after the date of this Notice, with the Clerk of the Court, Mr. Danny L. Miller, the Clerk of the U. S. Bankruptcy Court, Southern District of Mississippi, Thad Cochran U.S. Courthouse, 501 East Court Street, Suite 2.300, Jackson, MS 39201, and a copy of any objection must be served upon Craig M. Geno, Esq., Subchapter V Trustee, Law Offices of Craig M. Geno, PLLC, at 601 Renaissance Way, Suite A, Ridgeland, MS 39157. Attorneys and other registered users of the Case Management/Electronic Case Filing (CM/ECF) system shall file any such objection electronically. In the event an objection to this Motion is filed, it will be scheduled for hearing in due course.

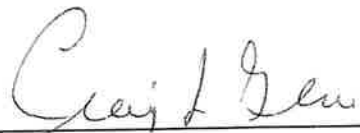
DATED, this the 16th day of May, 2025.

Respectfully submitted,

CRAIG M. GENO, SUBCHAPTER V TRUSTEE

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
601 Renaissance Way
Suite A
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

N:\Firm Data\Users\Bankrupt\Subchapter V Cases\Beckham Jewelry, LLC\Pleadings\Notice - Mot to Require Escrowed SubV Trustee Payments 6-3-24.wpd

EXHIBIT "A"

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: BECKHAM JEWELRY, LLC
Debtor

CHAPTER 11
CASE NO. 25-01234-JAW

MOTION TO REQUIRE ESCROWED SUBCHAPTER V TRUSTEE PAYMENTS

COMES NOW Craig M. Geno, the Subchapter V Trustee in the above styled and numbered case (the “Trustee”), and files this his *Motion to Require Escrowed Subchapter V Trustee Payments* (the “Motion”), and in support thereof, would respectfully show unto this Honorable Court as follows, to-wit:

1. The Trustee has been appointed as the Subchapter V Trustee in this Chapter 11 case.
2. There is no statutory requirement for the debtor-in-possession in a Subchapter V case to pay, or even escrow, fees and expenses of the trustee (or any trustee for that matter) while the case is pending and before entry of an order on confirmation of a plan.
3. In many instances, Subchapter V cases end up being dismissed, or converted to a case under Chapter 7, with no funds being paid to the Subchapter V trustee.
4. In addition, a number of Subchapter V cases are filed that simply are not going to be able to submit a feasible Chapter 11 plan, and the earlier the parties in the case know that, the better off everyone will be.
5. Bearing all of these considerations in mind, the Trustee moves the Court for an order requiring the Debtor to begin, immediately, depositing the sum of \$1,000 per month with the Trustee, to be held in escrow, pending an application for compensation and notice and a hearing in connection with such application. The escrowed funds will be used to defray the Trustee’s compensation, if any.

EXHIBIT “A”

6. In the event the Debtor cannot afford to escrow \$1,000 per month, or in the event the Debtor (or its equity security holders) are unwilling or unable to come up with \$1,000 per month to fund an escrow, then the parties should know that sooner rather than later and take such action as necessary.

7. Other courts around the country have granted similar motions in Subchapter V cases (although at least one court has declined to do so) and some courts either have pending local rules or standing orders requiring such retainers to be paid, subject to the fee application, notice and a hearing process.

8. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully prays that upon a hearing hereof this Honorable Court will enter its order granting the Motion. The Trustee prays for general relief.

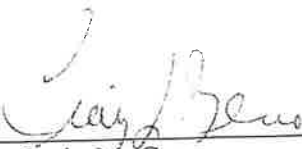
THIS, the 16th day of May, 2025.

Respectfully submitted,

CRAIG M. GENO, SUBCHAPTER V TRUSTEE

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
601 Renaissance Way
Suite A
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

N:\Firm Data\Users\Bankrupt\Subchapter V Cases\Bockham Jewelry, LLC\Pleadings\Mot to Require Escrowed SubV Trustee Payments 6-3-24 wpd

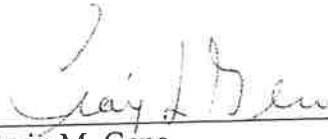
CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Christopher J. Steiskal, Sr., Esq.
Office off the United States Trustee
christopher.j.steiskal@usdoj.gov

Thomas C. Rollins, Jr., Esq.
trollins@therollinsfirm.com

THIS, the 16th day of May, 2025.



Craig M. Geno

Label Matrix for local noticing
0538-3
Case 25-01234-JAW
Southern District of Mississippi
Jackson-3 Divisional Office
Fri May 16 09:54:43 CDT 2025

Brian Beckham
120 District Blvd
Ste D110
Jackson, MS 39211-6304

Dynasty Casting
644 Shrewsberry Common
Shrewsbury, PA 17361-1617

Craig M. Geno
Law Offices of Craig M. Geno, PLLC
601 Renaissance Way
Suite A
Ridgeland, MS 39157-6038

Hinds Co Tax Collector
P.O. Box 1727
Jackson, MS 39215-1727

Kerry Whitt, Co
125 Deaton Rd
Owens Cross Roads, AL 35763-9553

McLeod & Rigel, PA
10 Professional Pkwy
Hattiesburg, MS 39402-2636

Thomas Carl Rollins Jr
The Rollins Law Firm, PLLC
PO BOX 13767
Jackson, MS 39236-3767

Stuller
P.O. Box 87777
Lafayette, LA 70598-7777

U.S. Attorney S.D. Mississippi
c/o Internal Revenue Service
501 E. Court Street, Ste. 4.430
Jackson, MS 39201-5025

Barnes, Bailey, & Jano
5 Riverbend Place
Ste A
Flowood, MS 39232-7618

Jennifer A Curry Calvillo
The Rollins Law Firm
702 W. Pine St
Hattiesburg, MS 39401-3836

Eldar, Inc
3068 N 2700 E
Forrest, IL 61741

Hakimi Diamond Corp
15 W 47th ST
New York, NY 10036-3305

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Lamha
20 W 47st St
Ste 807
New York, NY 10036-4298

Nivoda
580 5th Ave
Ste 2508
New York, NY 10036-4771

S. Kashi
175 Road Ste 204
Great Neck, NY 11021

TDLDC Retail I, LLC
300 Concourse Blvd
Ste 105
Ridgeland, MS 39157-2091

U.S. Attorney S.D. Mississippi
c/o U.S. Securities and Exchange Commiss
501 E. Court Street, Ste. 4.430
Jackson, MS 39201-5025

Beckham Jewelry, LLC
120 District Blvd, Ste D110
Jackson, MS 39211-6304

Dazzle Imports
5555 Glendridge Connec
Ste 200
Atlanta, GA 30342-4815

Gary Carriere
125 Deaton Rd
Owens Cross Roads, AL 35763-9553

Heera Moti, Inc
15 W 47th St
Ste 808
New York, NY 10036-3327

Kelly Waters
P.O. Box 240924
Boston, MA 02124-0016

(p)MISSISSIPPI STATE TAX COMMISSION
P O BOX 22808
JACKSON MS 39225-2808

Overnight Mountings, I
1400 Plaza Ave
New Hyde Park, NY 11040-4921

Christopher J. Steiskal Sr.
DOJ-Ust
501 East Court Street
Suite 6-430
Jackson, MS 39201-5022

TR Jewelry Concepts
2707 Mt. Rushmore Rd
Rapid City, SD 57701-5324

U.S. Securities and Exchange Commission
Office of Reorganization
950 East Paces Ferry Road, Suite 900
Atlanta, GA 30326-1382

EXHIBIT "B"

United States Trustee
501 East Court Street
Suite 6-430
Jackson, MS 39201-5022

WLBT
715 S Jefferson St
Jackson, MS 39201-5622

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service
P.O. Box 21126
Philadelphia, PA 19114

MS State Tax Commission
Bankruptcy Section
P.O. Box 23338
Jackson, MS 39225

End of Label Matrix	
Mailable recipients	31
Bypassed recipients	0
Total	31